



## The Stop & Shop Supermarket Company



An Ahold USA Company

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April 9, 2003

The Honorable Ann Veneman  
Secretary, U.S. Department of Agriculture  
Country of Origin Labeling Program  
Agricultural Marketing Service  
Stop 0249 Room 2092-S  
1400 Independence Avenue, SW  
Washington, DC 20250-0249

### TRANSMITTED BY FACSIMILE

**Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program**

Dear Secretary Veneman:

On behalf of the Stop & Shop Supermarket Company, I am writing in response to your request for comments regarding "Guidelines for the Interim Voluntary Country of Origin Labeling". I am the Vice President of Meat & Seafood for Stop & Shop Supermarkets headquartered in Boston Massachusetts. We operate 335 stores in Connecticut, Massachusetts, New Jersey, New York, and Rhode Island employing over 60,000 associates. Our parent company, Royal Ahold, owns six supermarket chains on the East Coast. As such, I am very concerned about the country of origin labeling guidelines that you issued.

Our meat department offers in excess of 250 types of whole muscle and ground beef, pork, and lamb products to consumers on a daily basis. Identifying the country in which the underlying animal or animals for each of those products was born, raised and slaughtered is an enormous task. We must be able to depend on our suppliers for that information and you must hold them accountable through strict enforcement mechanisms. We cannot look at a package of hamburger meat and determine whether the cow was born and raised in Canada or born in the U.S. and raised in Canada or born, raised and slaughtered in the U.S. Moreover, the operational challenges of labeling each of those items for retail sale on a daily basis are significantly substantial.

As you develop the regulations, please consider the following:

- Hold suppliers who are responsible for cattle, hogs and lamb at birth, feeding and slaughter accountable for providing complete accurate and verifiable information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of meat products at retail; and
- Implement reasonable recordkeeping requirements.

Finally, we urge you to conduct the rulemaking promptly and efficiently, since the statute requires retailers to be in full compliance on September 30, 2004. We respectfully ask you to issue regulations that will be simple to follow and to implement.

We appreciate your attention to our concerns and thank you for your time regarding this critical issue.

Sincerely,

Luke LaPerriere  
Vice President of Meat & Seafood Sales